

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

SHARI AHRENDSEN and BARRY CLEMENT, on behalf of the World Travel, Inc. Employee Stock Ownership Plan, and on behalf of a class of all other persons similarly situated,

Plaintiffs,

v.

PRUDENT FIDUCIARY SERVICES, LLC, a California Limited Liability Company, MIGUEL PAREDES, JAMES A. WELLS, JAMES R. WELLS, AND RICHARD G. WELLS.

Defendants.

**Case No. 2:21-cv-02157**

**JOINT MOTION TO EXTEND DEFENDANTS' DEADLINES TO RESPOND  
TO THE COMPLAINT AND RELATED BRIEFING**

Plaintiffs Shari Ahrendsen and Barry Clement (“Plaintiffs”); Defendants Prudent Fiduciary Services, LLC, and Miguel Paredes, (“PFS Defendants”); and Defendants James A. Wells, James R. Wells, and Richard G. Wells (“Wells Defendants”) (collectively, “Parties”) respectfully request that this Court enter an order extending Defendants’ deadlines for responding to Plaintiffs’ complaint and setting a briefing schedule for related opposition and reply briefs, if any. In support of this motion, the Parties state the following:

1. Plaintiffs filed a complaint on May 11, 2021. (Dkt. 1).
2. The Wells and PFS Defendants waived service on May 26 and May 25, 2021, respectively. (Dkts. 2-6). Defendants’ current responsive pleading deadline is July 26, 2021. (*Id.*)
3. Given the complexity of the matters at issue, the Parties respectfully request that the Court enter an order setting the following schedule:

- August 9, 2021: Deadline for Defendants to respond to the complaint.
- September 8, 2021: Deadline for Plaintiffs' opposition briefs, if any.
- September 29, 2021: Deadline for Defendants' reply briefs, if any.

Dated: July 16, 2021

Respectfully submitted,

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**CERTIFICATION OF COUNSEL**

Pursuant to Local Rule 7.1(b), I certify that I have conferred with counsel for all Parties, who consent to, and join in, the relief sought in this motion.

/s/ William J. Delany  
William J. Delany

**CERTIFICATE OF SERVICE**

I hereby certify that, on July 16, 2021, a copy of the foregoing was filed electronically using the Court's CM/ECF system, which will provide notice of the filing to all counsel of record.

By: /s/ William J. Delany  
William J. Delany